

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT**

**IN THE MATTER OF:**  
AARON MOHLMAN  
CHARLOTTE S DOBESSI-BOSSOMBO, Debtors

CHAPTER 13  
CASE NO: 22-46215  
JUDGE THOMAS J. TUCKER

**TRUSTEE'S OBJECTION TO  
CONFIRMATION OF CHAPTER 13 PLAN**

NOW COMES, the Chapter 13 Trustee, Tammy L. Terry, and objects to confirmation of the Chapter 13 Plan in the above matter pursuant to E.D. Mich. L.B.R. 3015-3(a) and 11 U.S.C. §1307(c)(5) as follows:

1. The Trustee objects to the debtors' failure to treat a secured proof of claim filed by Gary Deak. The Trustee requests that the debtors amend the plan accordingly.

2. The spouse provided recent payment advices that indicates that she earns approximately \$10,000.00 gross a month, which is more than the \$8,242.00 disclosed on Schedule I. The Trustee request that the debtors amend Schedules I and J and increase best effort accordingly.

3. The debtor's Plan fails to provide that all of the debtor's projected disposable income be utilized to fund the Plan. Specifically, the debtor's Schedule J has overstated the following expense(s) in contravention of 11 U.S.C. 1325(a)(3) and/or 11 U.S.C. 1325(b):

- a. Childcare - \$800.00
- b. Vehicle insurance - \$350.00

The Trustee requests that the debtor provide proof of these expenses within fourteen days.

4. The debtor testified at the §341 First Meeting of Creditors that he had job interviews in the recent months. The Trustee requests an update at confirmation and/or amended Schedules I and J at any point in time the debtor becomes employed during the life of the plan.

WHEREFORE, the Chapter 13 Trustee requests this Honorable Court deny confirmation of the debtor's (s') Chapter 13 Plan.

9/29/2022

OFFICE OF THE CHAPTER 13 TRUSTEE - DETROIT

**/S/ TAMMY L. TERRY**

Chapter 13 Standing Trustee

/S/ KIMBERLY SHORTER-SIEBERT (P49608)

/S/ MARILYN R. SOMERS-KANTZER (P52488)

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**CERTIFICATE OF MAILING**

I hereby certify that on **10/03/2022**, a copy of TRUSTEE'S OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN was electronically filed with the Clerk of Court, served electronically to the debtor's(s') attorney and a copy of same deposited in the U. S. Mail to the debtor (s) at the address as it appears below.

OFFICE OF THE CHAPTER 13 TRUSTEE - DETROIT  
/S/ PATRICE WATSON  
Chapter 13 Standing Trustee Clerk  
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